

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

Sait Kurmangaliyev

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Delta Air Lines, Inc.

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

CV 25 - 3423

DeARCY HALL, J.
POLLAK, M.J.

REC'D IN PR. SE OFFICE
JUN 18 '2 PM 12:59

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Sait Kurmangaliyev</u>
Street Address	<u>8684 20 Ave Apt 2E, Brooklyn, NY 11214</u>
City and County	<u>New York, Kings</u>
State and Zip Code	<u>New York 11214</u>
Telephone Number	<u>+1(323)234-1101</u>
E-mail Address	<u>kurmangaliyevsait@yahoo.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Delta Air Lines, Inc.</u>
Job or Title (if known)	<u>Corporation</u>
Street Address	<u>1030 Delta Blvd</u>
City and County	<u>Atlanta, Fulton</u>
State and Zip Code	<u>Georgia, 30354</u>
Telephone Number	<u>+1(404)715-2600</u>
E-mail Address (if known)	<u>N/A</u>

Defendant No. 2

Name	<u></u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>

State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known)

Defendant No. 3

Name _____
Job or Title _____
(if known)
Street Address City _____
and County State _____
and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known)

Defendant No. 4

Name _____
Job or Title _____
(if known)
Street Address City _____
and County State _____
and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Telephone Consumer Protection Act, 47 U.S.C. § 227

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

In April 2025, I contacted Delta Air Lines by text to ask about a flight. After that, Delta kept texting me repeatedly through its automated assistant, even though I opt-out and stopped replying. In May 2025, I texted "Stop" again assuming that I could get an opt-out message but instead their system initiated the conversation again. My phone number has been on the National Do Not Call Registry since February 9th 2023. Delta ~~failed~~ failed to honor my opt-out, which violated Telephone Consumer Protection Act, 47 U.S.C. § 222. I'm seeking statutory damages for this violation.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I request \$10,500 in statutory damages under the Telephone Consumer Protection Act, 47 U.S.C. § 227, for seven willful violations at \$1,500 each. I also request any additional relief the court deems just and proper, and I intend to notify the FCC and FTC of these violations.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

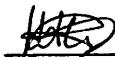
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: June 17, 2025.

Signature of Plaintiff

Printed Name of Plaintiff



Sait Kurmangaliyev

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Sart Kurnangalyev

(b) County of Residence of First Listed Plaintiff Kings
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Pro Se: 684 20 Ave Apt 2E +1(929) 234-1101
Brooklyn, NY 11214
kurnangalyevsart@yahoo.com

DEFENDANTS

Delta Air Lines, Inc.

County of Residence of First Listed Defendant Fulton
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

Hope Barron
King and Spalding LLP
1180 Peachtree St. NE Suite 1600, Atlanta, GA 30309

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 690 Other	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander		INTELLECTUAL PROPERTY RIGHTS	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability		<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine		<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability		<input type="checkbox"/> 835 Patent - Abbreviated New Drug Application	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)	<input type="checkbox"/> 350 Motor Vehicle	LABOR	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 880 Defend Trade Secrets Act of 2016	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 720 Labor/Management Relations	SOCIAL SECURITY	<input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692)
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 861 HIA (1395ff)	<input checked="" type="checkbox"/> 485 Telephone Consumer Protection Act
<input type="checkbox"/> 195 Contract Product Liability		<input type="checkbox"/> 751 Family and Medical Leave Act	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 196 Franchise		<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 850 Securities/Commodities/Exchange
		<input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
REAL PROPERTY	CIVIL RIGHTS	IMMIGRATION	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 462 Naturalization Application	FEDERAL TAX SUITS	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment		<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 896 Arbitration
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/Accommodations			<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment			<input type="checkbox"/> 950 Constitutionality of State Statutes
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other			
	<input type="checkbox"/> 448 Education			
	PRISONER PETITIONS			
	<input type="checkbox"/> 463 Alien Detainee			
	<input type="checkbox"/> 510 Motions to Vacate Sentence			
	<input type="checkbox"/> 530 General			
	<input type="checkbox"/> 535 Death Penalty			
	Other:			
	<input type="checkbox"/> 540 Mandamus & Other			
	<input type="checkbox"/> 550 Civil Rights			
	<input type="checkbox"/> 555 Prison Condition			
	<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

Unsolicited text messages sent by defendant after opt-out, in violation of the Telephone Consumer Protection Act.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

12,500

CHECK YES only if demanded in complaint: Not

JURY DEMAND:

☒ Yes ☐ No

47 USC

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

June 17, 2025

SIGNATURE OF ATTORNEY OF RECORD

Sart Kurnangalyev

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

CERTIFICATION OF ARBITRATION ELIGIBILITY

Local Arbitration Rule 83.7 provides that with certain exceptions, actions seeking money damages only in an amount not in excess of \$150,000, exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

Case is Eligible for Arbitration ☐

I, _____, counsel for _____, do hereby certify that the above captioned civil action is ineligible for compulsory arbitration for the following reason(s):

☐ monetary damages sought are in excess of \$150,000.00 exclusive of interest and costs,

☐ the complaint seeks injunctive relief, or

☒ the matter is otherwise ineligible for the following reason: *The action seeks relief under a federal statute (TCPA) and monetary damages under \$150,000*

DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1

Identify any parent corporation and any publicly held corporation that owns 10% or more of its stocks. Add an additional page if needed.

N/A - I'm an individual

RELATED CASE STATEMENT (Section VIII on the Front of this Form)

Please list all cases that are arguably related pursuant to Division of Business Rule 3 in Section VIII on the front of this form. Rule 3(a) provides that "A civil case is "related" to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 3(a) provides that "A civil case shall not be deemed "related" to another civil case merely because the civil case involves identical legal issues, or the same parties." Rule 3 further provides that "Presumptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (b), civil cases shall not be deemed to be "related" unless both cases are still pending before the court." *none*

NEW YORK EASTERN DISTRICT DIVISION OF BUSINESS RULE 1(d)(3)

If you answer "Yes" to any of the questions below, this case will be designated as a Central Islip case and you must select Office Code 2.

1. Is the action being removed from a state court that is located in Nassau or Suffolk County? ☐ Yes ☒ No
2. Is the action—not involving real property—being brought against United States, its officers or its employees AND the majority of the plaintiffs reside in Nassau or Suffolk County? ☐ Yes ☒ No
3. If you answered "No" to all parts of Questions 1 and 2:
 - a. Did a substantial part of the events or omissions giving rise to claim or claims occur in Nassau or Suffolk County? ☐ Yes ☒ No
 - b. Do the majority of defendants reside in Nassau or Suffolk County? ☐ Yes ☒ No
 - c. Is a substantial amount of any property at issue located in Nassau or Suffolk County? ☐ Yes ☒ No
4. If this is a Fair Debt Collection Practice Act case, was the offending communication received in either Nassau or Suffolk County? ☐ Yes ☒ No

(Note, a natural person is considered to reside in the county in which that person is domiciled; an entity is considered a resident of the county that is either its principal place of business or headquarters, or if there is no such county in the Eastern District, the county within the District with which it has the most significant contacts).

BAR ADMISSION

I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court.

☐ Yes ☒ No

Are you currently the subject of any disciplinary action (s) in this or any other state or federal court?

☐ Yes (If yes, please explain) ☒ No

I certify the accuracy of all information provided above.

Signature: *[Signature]*

Exhibit A – Text Message Screenshots

- All Delta texts received (April–May 2025)
- Include timestamps and short code (33582)
- I've sent "STOP" on a page Exhibit A – Page 5 and they kept replying

1:45

5G

< 1



33582 >

Text Message • SMS
Sat, Apr 19 at 5:14 PM

Hi! Welcome to Delta messaging. Click the link below and type your question in the new window. We will be with you shortly.

<https://deltasupport.delta.com/select/eQj7-CL8t>

To stop receiving messages, reply STOP. For help, reply HELP.

Hello

Hi, I am Delta's virtual assistant

Looks like you were looking for help with Flight Change

Do you want to change your flight on the same day of your departure?

Please note that you can only make a same-day change within 24 hours of your flight's originally scheduled departure

A) Yes
B) No

I'm flying to Chicago on April 22 I can't make it to my flight is there a way I can cancel it for a refund?!

I can assist you with canceling your trip or address any issues related to



Text Message • SMS



1:45

5G

< 1



33582 >

trip cancellation

What do you need help with?

- A) Cancel trip
- B) Reopen upgrade cert
- C) Issue canceling trip

Cancel trip

Refund eligibility may vary based on your ticket type and cancellation circumstances

To look up your trip to cancel, please provide your 6-character confirmation number or 13-digit ticket number

H58A90

What is the name (first + last) associated with this confirmation number?

Sait Kurmangaliyev

Does the following information look correct?

First Name: Sait
Last Name: Kurmangaliyev
Confirmation Number: H58A90

- A) Yes, submit
- B) No, edit



Text Message • SMS



1:45

5G

< 1



33582

Yes submit

Please wait while I retrieve your trip details

The name you provided does not match our passenger list

Let's try again

What is the name (first + last) associated with this confirmation number?

Sait A Kurmangaliyev

Does the following information look correct?

First Name: Sait A
Last Name: Kurmangaliyev
Confirmation Number: H58A90

A) Yes, submit
B) No, edit

Yes, Submit

Please wait while I retrieve your trip details

Trip Details
One Way: ORD → LGA | Departure:
April 17, 2025 12:20 PM
(Refund or eCredit not available for



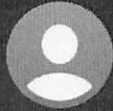
Text Message • SMS



1:45

5G

1



33582

flights you've completed)

One Way: LGA → ORD | Departure:
April 22, 2025 04:30 PM

We understand that plans may change. Unfortunately, most Basic Economy tickets are non-refundable and cannot be exchanged for eCredits

However, we encourage you to go ahead and cancel if you can't make your trip

Cancel Details

1. SAIT A KURMANGALIYEV

Flight total: \$ 108.24 USD

Taxes, fees and charges: \$ 38.72

Total refund: \$ 0

To view more itemized details, select 'View more details'

- A) Proceed with no refund
- B) Cancel another trip
- C) Exit without canceling
- D) View more details

C

Is there anything else that I can help you with?

A) Yes

B) No



Text Message • SMS



1:45

5G

1



33582

No problem. If you need to cancel your trip later, you can always come back and message us

B

Great! Glad I could help

Thank you for contacting Delta Air Lines. Please take our brief survey to let us know how we did. To opt out, please reply "skip" at any time.

Please rate your overall satisfaction with Delta's Virtual Assistant. Please reply with a value between 1-5.

- 5 - Very Satisfied
- 4 - Satisfied
- 3 - Neither
- 2 - Dissatisfied
- 1 - Very Dissatisfied

STOP

Sorry I didn't get that, please select one of the following options:

Please rate your overall satisfaction with Delta's Virtual Assistant. Please reply with a value between 1-5.

- 5 - Very Satisfied
- 4 - Satisfied
- 3 - Neither
- 2 - Dissatisfied
- 1 - Very Dissatisfied



Text Message • SMS



1:46

5G

< 1



33582

- 5 - Very Satisfied
- 4 - Satisfied
- 3 - Neither
- 2 - Dissatisfied
- 1 - Very Dissatisfied

5

Did the Virtual Assistant answer your question? Please reply with 1 or 2.

- 1 - Yes
- 2 - No

STOP

Sorry I didn't get that, please select one of the following options:

Did the Virtual Assistant answer your question? Please reply with 1 or 2.

- 1 - Yes
- 2 - No

The survey has expired. Thank you for your time.

Mon, May 26 at 1:23 PM

STOP

Hi, I am Delta's virtual assistant: This is not a subscription. No further messages will be sent. Message HELP for assistance.



Text Message • SMS



Exhibit B – National Do Not Call Registry Proof

- A screenshot showing that my number was listed on the DNC registry since **February 9, 2023**.

 Compose

← Back

↑ ↓ ×

 Inbox

National Do Not Call Registry - Your Registration Is Confirmed

To: me · Sun, Jun 1 at 11:51 PM ✓


Visit site

Thank you for registering your phone number with the National Do Not Call Registry. You successfully registered your phone number ending in 1101 on February 09, 2023. Most telemarketers will be required to stop calling you 31 days from your registration date.

Visit <https://www.donotcall.gov> to register another number or file a complaint against someone violating the Registry.

Please do not reply to this message as it is from an unattended mailbox. Any replies to this email will not be responded to or forwarded. This service is used for outgoing emails only and cannot respond to inquiries

Reply 

Forward 

Starred Contacts

More ▾

**EXPERT HEALTH CARE
AT YOUR FINGERTIPS.**

... New York-
Presbyterian

 Tremfya[®]
(qesilumab)

For adults with moderate to severe plaque psoriasis (PsO)

Don't let symptoms define you.

PRESCRIBING INFO MEDICATION GUIDE

IMPORTANT SAFETY INFORMATION

What is the most important information I should know about TREMFYA®?
TREMFYA® is a prescription medicine that may

Exhibit C – Pre-Litigation Demand Letter dated June 3, 2025

- Shows that I gave Delta notice and a chance to settle before filing
- Confirms they didn't act in good faith

Sait Kurmangaliyev
8684 20 Ave Apt 2E
Brooklyn, NY 11214
kurmangaliyevsait@yahoo.com
(929) 234-1101

June 3, 2025

Delta Air Lines, Inc.
1030 Delta Blvd
Atlanta, GA 30354

Via Certified Mail

Re: Notice of Demand – Unlawful Telemarketing Texts in Violation of the TCPA

To Whom It May Concern:

I am writing to formally demand compensation for violations of the Telephone Consumer Protection Act (TCPA), 47 U.S.C. § 227, by Delta Air Lines, Inc.

My phone number, (929) 234-1101, has been listed on the National Do Not Call Registry since February 9, 2023. Despite this, I received a series of unsolicited marketing and customer interaction messages from Delta Air Lines via short code 33582 in April and May 2025. These messages were sent without my prior express written consent and continued even after I attempted to opt out by replying "STOP."

Under the TCPA, each unauthorized text message is a violation subject to statutory damages of up to \$1,500 per message for willful violations. I have documented at least **seven** such violations, for which I now demand **\$10,500** in compensation.

Please respond to this demand within **10 days of receipt**. If I do not receive payment or a satisfactory resolution by that time, I will proceed with legal action in federal court and will also consider filing complaints with the **Federal Communications Commission (FCC)** and **Federal Trade Commission (FTC)**. I will pursue the maximum penalties allowed under law.

This letter is not a settlement offer and does not waive any legal rights.

Sincerely,
Sait Kurmangaliyev

Exhibit D – Proof of them receiving my demand

9589 0710 5270 1673 3921 47

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Atlanta, GA 30320

OFFICIAL USE

Certified Mail Fee \$4.85
\$0.00
Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$0.00
☐ Return Receipt (electronic) \$0.00
☐ Certified Mail Restricted Delivery \$0.00
☐ Adult Signature Required \$0.00
☐ Adult Signature Restricted Delivery \$0.00

0336 07
Postmark Here
06/03/2025

Postage \$2.04
\$0.00
Total Postage and Fees \$2.04

Sent To Legal Department, Delta Air Lines, Inc.
Street and Apt. No., or PO Box No. P.O. Box 20706
City, State, ZIP+4® Atlanta, GA 30320-6001

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions



TRACK STATUS BY TEXT MESSAGE
Send tracking number to 28777 (2USPS)
Standard message and data rates may apply

TRACK STATUS ONLINE
Visit <https://www.usps.com/tracking>
Text and e-mail alerts available

PURCHASE DETAILS

Product	Qty	Unit Price	Price
Mailer 10.5 x 16	1	\$1.69	\$1.69
First-Class Mail® Large Envelope	1		\$2.04

Atlanta, GA 30320
Weight: 0 lb 2.80 oz
Estimated Delivery Date
Fri 06/06/2025
Certified Mail®
Tracking #:

\$4.85

Total 9589 0710 5270 1673 3921 47
\$6.89

Google

usps tracking



All Mode

All

Images

Short videos

Shopping

Forums

Videos

More ▾

Track your package

Data provided by USPS



Tracking number 9589071052701673392147

Delivered ✓

June 10, 10:43AM

Atlanta, GA



View details on USPS



Call 1-800-275-8777



Track another package